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ATTORNEYS FOR WASHOE COUNTY
DEFENDANTS

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

* * *

DREW RIBAR,

Plaintiff,

Case No. 3:24-CV-00526-ART-CLB

vs.

WASHOE COUNTY, NEVADA;
WASHOE COUNTY LIBRARY
SYSTEM; BUILD OUR CENTER, INC.;
JEFF SCOTT; STACY MCKENZIE;
JONNICA BOWEN; LIBRARY
EMPLOYEE DOE #1; JENNIFER COLE;
DEPUTY C. ROTHKIN (BADGE #5696);
DEPUTY R. SAPIDA (BADGE #4663;
SGT. GEORGE GOMEZ (BADGE
#4066); AND JOHN/JANE DOES 1+10,

Defendants.

COUNTY DEFENDANTS'
RESPONSE TO PLAINTIFF'S
MOTION FOR PROTECTIVE ORDER
UNDER FRCP 26(c)

(ECF No. 84)

Washoe County, Washoe County Library System, Jeff Scott, Stacy McKenzie, Jonnica Bowen, Jennifer Cole, Deputy Rothkin, Deputy Sapida, and Sgt. Gomez ("Washoe County Defendants") through counsel, Lindsay L. Liddell, Deputy District Attorney, hereby respond to Plaintiff's Motion for Protective Order Under FRCP 26(c) (ECF No. 84). This

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1 Response is based on the following Memorandum of Points and Authorities, the pleadings
2 and papers on file, this Court's Standing Order (ECF No. 28), and LR 26-6.

3 **MEMORANDUM OF POINTS AND AUTHORITIES**

4 Ribar filed the instant Motion for a protective order requesting relief from a
5 request for production served upon him regarding his Chat GPT logs. Ribar failed to
6 comply with LR 26-6(c) or this Court's Standing Order (ECF No. 28), because the motion
7 lacks the required certification about a meet and confer. Moreover, Ribar entirely failed
8 to make any effort to meet and confer on this issue, whether by email or otherwise. The
9 filing of the instant Motion is the first time County Defendants became aware of any
10 issue Ribar has with the document request described in the Motion.

11 Had Ribar made any attempt to meet and confer, he would have learned of
12 County Defendants' willingness to withdraw the request entirely and would not have
13 wasted judicial resources in this non-dispute. County Defendants hereby withdraw their
14 Request for Production No. 28, seeking Chat GPT logs.

15 The Court should deny the instant Motion as moot, and further remind Ribar that
16 he must comply with the rules of this Court.

17 Dated this 7th day of May, 2025.

18
19 By /s/ Lindsay Liddell
LINDSAY LIDDELL
Deputy District Attorney
20 ANDREW COBI BURNETT
Deputy District Attorney

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22 ATTORNEYS FOR WASHOE COUNTY
DEFENDANTS
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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the Office of the District Attorney of Washoe County, over the age of 21 years and not a party to nor interested in the within action. I certify that on this date, I deposited for mailing in the U.S. Mails, with postage fully prepaid, a true and correct copy of the foregoing document in an envelope addressed to the following:

DREW RIBAR
3480 PERSHING LANE
WASHOE VALLEY. NV 89704

I certify that on this date, the foregoing was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

DREW RIBAR
ALISON R. KERTIS, ESQ.

Dated this 7th day of May, 2025.

/s/ S. Haldeman
S. Haldeman